

Application No.: 09/722923

Docket No.: SMQ-114RCE/P5635

**REMARKS**

Applicants note with appreciation that the Examiner deems claims 11, 12, 28, 29, 45, and 46 to recite allowable subject matter. Applicants incorporate the allowable subject matter of claims 11, 28, and 45 into claims 9, 26, and 43, respectively. Claims 1, 2, 7-10, 12-14, 16-19, 22, 24-27, 29-31, 34-36, 38, 42-44, 46-48, 50-53, 55-56, and 59 are amended and claims 11, 28, and 45 are canceled. Hence, claims 1-10, 12-27, 29-44, and 46-59 are pending, of which claims 1, 9, 18, 26, 35, 43, and 52 are independent. Support for the claim amendment can be found at page 11, lines 19-24. No new matter is added. Applicants respectfully submit that the pending claims define over the art of record.

Claims 1-10, 13-27, 30-44, 47-59 are rejected under 35 U.S.C. §103(a) as being unpatentable over United States Patent No. 6,678,867 to Fong et al. (hereafter "Fong"). Applicants respectfully submit that Fong does not teach or suggest each and every element and limitations of independent claims 1, 9, 18, 26, 35, 43, and 52.

**Claims 1-8, 18-25, and 35-42**

Independent claims 1, 18, and 35 require the limitation of adding content of a first structured document and a second structured document in a database, wherein the first structured document represents a first object implemented in a first programming environment and the second structured document represents a second object implemented in a second programming environment. Applicants respectfully submit that Fong does not teach or suggest this limitation.

Fong teaches a graphical user interface for processing information encoded in a structured information format to transform the information into another structured information format. In other words, Fong teaches how to transform a structured document from one format to another. In contrast, claims 1, 18, and 35 requires adding content of a first structured document and a second structured document into a single database, where the first structured document represents an object implemented in one programming language and the second structured document represents another object implemented in another programming language. The advantage of the claimed invention is that where there is two applications written in two different programming languages, they can share objects stored in one single database and eliminate the problem of duplicating databases to provide the applications to store objects in

Application No.: 09/722923

Docket No.: SMQ-114RCE/P5635

different programming languages even when the applications use the same data objects that are instantiated from the same class. See page 2, lines 18-22 of the present application.

Accordingly, Fong does not teach or suggest the limitation of adding content of a first structured document and a second structured document in a database, wherein the first structured document represents a first object implemented in a first programming environment and the second structured document represents a second object implemented in a second programming environment, as required by independent claims 1, 18, and 35. Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claims 1, 18, and 35 and their corresponding dependent claims 2-8, 19-25, and 36-42.

Claims 9, 10, 12-17, 26, 27, 29-34, 43, 44, 46- 59

Independent claims 9, 26, 43, and 52 require the limitation of a first structured document and a second structured document to respectively represent a first object and a second object in a database, wherein the first object including attributes and attributes values defined for a class in a first programming language whereas the second object including attributes and attributes values defined for the class in a second programming language. Applicants respectfully submit that Fong does not teach or suggest this limitation.

As set forth above, Fong teaches how to transform a structured document from one format to another. In contrast, claims 9, 26, 43, and 52 requires that a first structured document and a second structured document to respectively represent a first object and a second object in a single database, where the first object includes attributes and attribute values defined for a class in a first programming language and the second object includes attributes and attribute values defined for the same class in a second programming language.

Therefore, Applicants respectfully submit that Fong does not teach or suggest the limitation of a first structured document and a second structured document to respectively represent a first object and a second object in a database, wherein the first object including attributes and attributes values defined for a class in a first programming language whereas the second object including attributes and attributes values defined for the class in a second programming language, as required by claims 9, 26, 43, and 52. Applicants respectfully request

Application No.: 09/722923

Docket No.: SMQ-114RCE/P5635

that the Examiner reconsider and withdraw the rejection of independent claims 9, 26, 43, and 52 and their corresponding dependent claims 10, 12-17, 27, 29-34, 44, 46- 51, and 53-59.

In view of the above amendment, Applicants believe the pending application is in condition for allowance.

Applicants believe no fee is due with this statement. However, if a fee is due, please charge our Deposit Account No. 12-0080, under Order No. SMQ-114RCE from which the undersigned is authorized to draw.

Dated: March 24, 2006

Respectfully submitted,

By 

Kevin J. Canning

Registration No.: 35,470

LAHIVE &amp; COCKFIELD, LLP

28 State Street

Boston, Massachusetts 02109

(617) 227-7400

(617) 742-4214 (Fax)

Attorney For Applicant